

Nos. 23-1175(L), 23-1222

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

CITY OF PORT ISABEL, et al.,
Petitioners,

v.

FEDERAL ENERGY REGULATORY COMMISSION,
Respondent,

TEXAS LNG BROWNSVILLE LLC,
Respondent-Intervenor.

On Petition for Review of Orders of the Federal Energy Regulatory Commission

**REPLY IN SUPPORT OF MOTION
FOR A 30-DAY EXTENSION OF TIME**

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Intervenor Texas LNG Brownsville LLC (Texas LNG) hereby responds to Petitioners' opposition to its motion for a 30-day extension of the current deadline for parties to seek rehearing and rehearing en banc.

1. In light of the combined opinion and judgment, Texas LNG requested a 30-day extension to parallel the request made by Rio Grande, to ensure that the rehearing deadlines are kept in sync. Petitioners opposed, referring to their opposition to Rio Grande's extension request. As explained in Rio Grande's subsequent reply, the points made in Petitioners' opposition do not support denying the extension. *See* Case No. 23-1174, Doc. 2072260.

2. These cases raise complicated questions of fact and law spanning two records across two sets of dockets. The request for an extension of time here is made in good faith and will enable coordination with counsel for Rio Grande, Rio Bravo, and FERC, and will provide additional time for affected entities to prepare amicus briefs, as appropriate.

3. In addition, as noted in the motion, the extension will enable Texas LNG to complete its review and fulsomely present its arguments to the Court. While undersigned counsel has been working diligently on this matter, additional time is needed to complete their review of the distinct Texas LNG record and will also help accommodate counsel's other new filing deadlines, which have recently arisen to fall within this timeframe,

including managing a reply brief in *Martin v. Uber Technologies*, case 24-61340 (S.D. Fla.) for which the schedule was adjusted only last week, such that the reply is now also due September 20, 2024, as well as a new amicus brief to be filed that same day in *New Jersey Conservation Foundation v. FERC*, No. 23-1064 (D.C. Cir.).

CONCLUSION

For the forgoing reasons, this Court should grant the requested 30-day extension of time (to and including October 21, 2024) to petition for rehearing and rehearing en banc in these consolidated cases.

Respectfully submitted,

/s/ Varu Chilakamarri

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September 5, 2024

CERTIFICATE OF COMPLIANCE

This reply complies with the type-volume limitation of Fed. R. App. P. 27(d)(2) because this motion contains 319 words, excluding the parts of the motion exempted by Fed. R. App. P. 32(f). This brief complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type style requirements of Fed. R. App. P. 32(a)(6) because it has been prepared in a proportionally spaced typeface using Microsoft Word 365 in Times New Roman 14-point font.

/s/ Varu Chilakamarri
Varu Chilakamarri

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of September 2024, I electronically filed the foregoing with the Clerk of the Court for the U.S. Court of Appeals for the D.C. Circuit using the appellate CM/ECF system and served copies of the foregoing via the Court's CM/ECF system on all ECF-registered counsel.

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